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March 13, 2020

RECEIVED

MAR 13 2020

PUBLIC SERVICE
COMMISSION

HAND DELIVERED

Kent Chandler
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

Re: Bollinger v. KAW, Case No. 2019-00016

Dear Mr. Chandler:

Enclosed please find Kentucky-American Water Company's Responses to the Commission Staff's Third Request for Information in the above-referenced matter.

Very truly yours,

A handwritten signature in blue ink that reads "Lindsey W. Ingram III".

Lindsey W. Ingram III

Enclosure

cc: William Bollinger

CERTIFICATE OF SERVICE

This is to certify that the original and 7 copies of the foregoing have been filed on this 13th day of March, 2020 at the Public Service Commission and that a true and accurate copy of same has been served, via U.S. Mail, on the 13th day of March, 2020, upon the following:

William Ellis Bollinger III
5875 Paris Pike
Georgetown, Kentucky 40324-8716

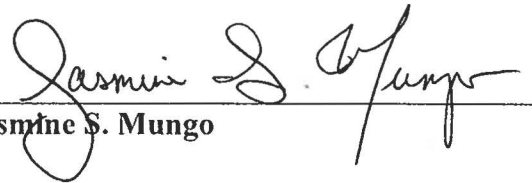


Counsel for Kentucky American Water

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF FAYETTE)

The undersigned, **Jasmine S. Mungo**, being duly sworn, deposes and says she is the Manager, Customer Accounts for Kentucky-American Water Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.



Jasmine S. Mungo

Subscribed and sworn to before me, a Notary Public in and before said County and Commonwealth, this 12th day of March, 2020.



Notary Public (SEAL)

My Commission Expires:

7/25/2020

**KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2019-00016
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

Witness: Jasmine S. Mungo

1. Refer to Kentucky-American's response to Commission Staff's First Request for Information, Item 2(c). Provide an updated chart that includes information from November 2017 to the present date. If an estimate was generated for a specific month, then provide the estimated amount as well as the actual amount of water usage in gallons.

Response:

Please see the updated below chart which includes the amount of water usage in gallons.

Original				Adjusted			
Billing Date	Read	Usage in Gallons	Reading Type	Billing Date	Read	Usage in Gallons	Reading Type
11/20/2017	6	600	Actual	11/20/2017	6	600	Actual
12/20/2017	14	800	Actual	12/20/2017	14	800	Actual
1/25/2018	23	900	Estimated	1/25/2018	168	15400	Calculated
2/23/2018	30	700	Estimated	2/23/2018	292	12400	Calculated
3/26/2018	37	700	Estimated	3/26/2018	416	12400	Calculated
4/24/2018	45	800	Estimated	4/24/2018	548	13200	Calculated
5/23/2018	677	63200	Actual	5/23/2018	677	12900	Actual
6/25/2018	746	6900	Estimated	6/25/2018	746	6900	Estimated
7/25/2018	886	14000	Estimated	7/25/2018	886	14000	Estimated
8/15/2018*	928	4200	Actual	8/15/2018*	928	4200	Actual
8/16/2018*	0	0	Actual	8/16/2018*	0	0	Actual
8/23/2018	848	84800	Actual	8/27/2018	11	1100	Calculated
9/25/2018	62	5100	Actual	9/25/2018	62	5100	Actual
10/23/2018	111	4900	Actual	10/23/2018	111	4900	Actual
11/27/2018	167	5600	Actual	11/27/2018	167	5600	Actual
12/24/2018	216	4900	Actual	12/24/2018	216	4900	Actual
1/25/2019	266	5000	Actual	1/25/2019	266	5000	Actual
2/28/2019	317	5100	Actual	2/28/2019	317	5100	Actual
3/21/2019	346	2900	Actual	3/21/2019	346	2900	Actual
4/23/2019	394	4800	Actual	4/23/2019	394	4800	Actual
5/22/2019	452	5800	Actual	5/22/2019	452	5800	Actual
6/24/2019	518	6600	Actual	6/24/2019	518	6600	Actual
7/23/2019	575	5700	Actual	7/23/2019	575	5700	Actual
8/22/2019	648	7300	Actual	8/22/2019	648	7300	Actual
9/25/2019	729	8100	Actual	9/25/2019	729	8100	Actual
10/23/2019	788	5900	Actual	10/23/2019	788	5900	Actual
11/25/2019	866	7800	Actual	11/25/2019	866	7800	Actual
12/27/2019	921	5500	Estimated	12/27/2019	921	5500	Estimated
1/28/2020	969	4800	Actual	1/28/2020	969	4800	Actual
2/26/2020	1011	4200	Actual	2/26/2020	1011	4200	Actual

*Indicates a meter change

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Witness: Jasmine S. Mungo

2. Provide a detailed explanation of the technical capabilities of Mr. Bollinger's old meter that was replaced on August 16, 2018. Be sure to explain whether the old meter was capable of capturing exact monthly water usage.

Response:

The old meter that was replaced on August 16, 2018 was capable of measuring accurate water usage. The meter had a physical display (dial) of the meter reading and, with the attached Meter Interface Unit, or MIU, there is an added capability of transmitting those meter readings electronically. Additionally, this particular MIU was able to provide daily or hourly usage reports called data logs. The daily usage log was attached to KAW's June 24, 2019 Answer and Motion to Dismiss. That daily log covers the period from 4/20/2018 to 7/25/18. It shows the measured daily usage declined *prior* to the meter being replaced on August 16, 2018 indicating the *absence* of any sort of problem with the older meter itself. The absence of a problem with the old meter is further confirmed by the accurate test results that were also attached to KAW's June 24, 2019 Answer and Motion to Dismiss.

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Witness: Jasmine S. Mungo

3. Refer to Kentucky-American's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1. Also, refer to 807 KAR 5:006, Section 7(5)(a), which states that each utility shall read customer meters at least quarterly, except if prevented by reasons beyond its control. Commission regulation 807 KAR 5:006, Section 7(5)(d), states that if due to reasons beyond its control, a utility is unable to read a meter, the utility shall record the date and time the attempt was made, if applicable, and the reason the utility was unable to read the meter.
 - a. Confirm that Kentucky-American violated 807 KAR 5:006, Section 7(5)(a), by not conducting actual reads of the Complainants' meter at least quarterly. If this is not confirmed, explain the answer in full detail.
 - b. Confirm that Kentucky-American violated 807 KAR 5:006, Section (5)(d), by not recording specific reasons for each time that Kentucky-American attempted to perform actual reads on the Complainant's meter. For example, Kentucky-American states, "[o]ffice estimate, no read or skip code was obtained in the field so the meter was estimated in the office" as a reason that Kentucky-American did not perform an actual read of Mr. Bollinger's meter on January 23, 2018, and March 20, 2018. If this is not confirmed, explain the answer in full detail.
 - c. Explain in full detail what is meant by "[b]roken reading device skip code was entered by field employee," which was noted for meter reading dates February 20, 2018, April 19, 2018, and July 18, 2018.
 - d. Explain in full detail what is meant by "[m]annual read entered was out of line with previous meter readings," which was noted for meter reading date August 20, 2018.
 - e. Provide a replication of the chart contained in this response, and include the information from November 17, 2017, until present date.

Response:

- A. Kentucky-American confirms that an actual read of Mr. Bollinger's meter was not obtained during the first quarter of 2018 (January 25, 2018 through April 24, 2018), but Kentucky-American does not confirm a violation of the referenced regulation. The referenced regulation does not say that the "read" must be "actual." It just says that meters must be read quarterly. In this case, there were instances where there was not an "actual" read, so KAW made estimated reads based on historical customer use. See the response to PSC 3-4(a) and PSC 3-4(f). Certainly, KAW strives to make actual reads monthly, but that did

not happen in this case, so KAW used a dependable method of estimating a read. Please also see KAW's response to PSC 3-4(g). Certainly, KAW endeavors to comply with both the letter and spirit of the Commission's regulations and it believes it did so in this case.

- B. Kentucky-American does not confirm there was a violation. The phrase "no read or skip code was obtained" is a reason KAW was not able to make an actual read of the meter. This phrase means that the receiving device used by the KAW meter reader was unable to obtain the necessary information for an actual read. That inability is the reason why an actual read did not occur. As for what circumstances can create that inability, please see KAW's response to PSC 3-4(f).
- C. Broken reading device skip code was entered by field employee" means that a field employee entered the skip code "broken reading device" because the meter's MIU was not transmitting the meter reading electronically.
- D. "Manual read entered was out of line with previous meter reading" means that the service order read of "848" recorded at the time of the meter reading on August 20, 2018 did not align with previous readings on the account, given that the new meter (26930415) was installed with a read of "0" on August 16, 2018. A service order completed on August 24, 2018 confirmed the meter reading to be "11". This prompted the previously recorded reading of "848" to be marked as "out of line" and manually changed, or calculated, to "11" in Kentucky-American's system.
- E. Please reference this replicated chart below to include the information from November 17, 2017 until present.

Original				Adjusted			
Billing Date	Read	Usage in Gallons	Reading Type	Billing Date	Read	Usage in Gallons	Reading Type
11/20/2017	6	600	Actual	11/20/2017	6	600	Actual
12/20/2017	14	800	Actual	12/20/2017	14	800	Actual
1/25/2018	23	900	Estimated	1/25/2018	168	15400	Calculated
2/23/2018	30	700	Estimated	2/23/2018	292	12400	Calculated
3/26/2018	37	700	Estimated	3/26/2018	416	12400	Calculated
4/24/2018	45	800	Estimated	4/24/2018	548	13200	Calculated
5/23/2018	677	63200	Actual	5/23/2018	677	12900	Actual
6/25/2018	746	6900	Estimated	6/25/2018	746	6900	Estimated
7/25/2018	886	14000	Estimated	7/25/2018	886	14000	Estimated
8/15/2018*	928	4200	Actual	8/15/2018*	928	4200	Actual
8/16/2018*	0	0	Actual	8/16/2018*	0	0	Actual
8/23/2018	848	84800	Actual	8/27/2018	11	1100	Calculated
9/25/2018	62	5100	Actual	9/25/2018	62	5100	Actual
10/23/2018	111	4900	Actual	10/23/2018	111	4900	Actual
11/27/2018	167	5600	Actual	11/27/2018	167	5600	Actual
12/24/2018	216	4900	Actual	12/24/2018	216	4900	Actual
1/25/2019	266	5000	Actual	1/25/2019	266	5000	Actual
2/28/2019	317	5100	Actual	2/28/2019	317	5100	Actual
3/21/2019	346	2900	Actual	3/21/2019	346	2900	Actual
4/23/2019	394	4800	Actual	4/23/2019	394	4800	Actual
5/22/2019	452	5800	Actual	5/22/2019	452	5800	Actual
6/24/2019	518	6600	Actual	6/24/2019	518	6600	Actual
7/23/2019	575	5700	Actual	7/23/2019	575	5700	Actual
8/22/2019	648	7300	Actual	8/22/2019	648	7300	Actual
9/25/2019	729	8100	Actual	9/25/2019	729	8100	Actual
10/23/2019	788	5900	Actual	10/23/2019	788	5900	Actual
11/25/2019	866	7800	Actual	11/25/2019	866	7800	Actual
12/27/2019	921	5500	Estimated	12/27/2019	921	5500	Estimated
1/28/2020	969	4800	Actual	1/28/2020	969	4800	Actual
2/26/2020	1011	4200	Actual	2/26/2020	1011	4200	Actual

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CASE NO. 2019-00016
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

Witness: Jasmine S. Mungo

4. Refer to Kentucky-American's response to Staff's Second Request, Item 2.
 - a. Kentucky-American states that if actual usage data is not transmitted, then Kentucky-American's billing system generates and sends a bill based on estimated usage. Explain in detail how the billing system calculates an estimated usage.
 - b. Kentucky-American states that if actual usage data is not transmitted, then Kentucky-American creates a service order to inspect the equipment for proper operation. Explain whether this occurs after the first estimated usage read, and if so, why was Mr. Bollinger's meter not inspected for proper operation after the first estimated read.
 - c. Kentucky-American states that if continued estimated data is observed, then Kentucky-American generates a service order in an attempt to identify why actual data is not being delivered. Explain at what point this normally occurs in the process. Further, explain why Kentucky-American did not attempt to identify why actual data was not being delivered by Mr. Bollinger's meter from January 23, 2018, through August 20, 2018.
 - d. Kentucky-American notes that on February 22, 2018, a service order to repair Mr. Bollinger's reading device was created, and it auto expired due to not being worked within the allotted time frame. Explain why a service order would ever auto expire, and not be renewed in the system.
 - e. Kentucky-American notes that on April 11, 2018, a service order to stop the estimates was not completed because the meter pit needed to be located. Explain in full detail what is meant by this statement.
 - f. Explain in specific detail why Kentucky-American was unable to obtain actual reads of Mr. Bollinger's meter, and instead estimated the reads between January 23, 2018, and August 20, 2018. If Kentucky-American performed an investigation into this issue, provide a copy of the same.
 - g. Explain whether Kentucky-American has implemented new policies and procedures to prevent Kentucky-American from generating estimated usage for long periods, instead of properly conducting an actual read of the water meter. If not, explain why not.

Response:

- a. When actual usage data from the current read cycle is not available, Kentucky-American's billing department reviews the account and references previously recorded usage information. To calculate estimated usage for the current read cycle, a daily consumption average is determined based on previously recorded usage information, and that average is then multiplied by the number of days that need to be billed.
- b. In Mr. Bollinger's case, with a 5/8" meter, a service order is generated after the second consecutive estimated read. After two consecutive estimated reads on 01/25/2018 and 02/23/2018 a service order was created to inspect for proper operation of the meter. Please also see the response to (d) below.
- c. In Mr. Bollinger's case, with a 5/8" meter, a service order was generated after the second consecutive estimated read. This account did have an actual read delivered on May 18, 2018 which occurred in the timeframe questioned of January 23, 2018 through August 20, 2018. This actual read was used for the billing date May 23, 2018 which restarted the count of the estimated reading occurrences. Kentucky-American did attempt to identify why actual data was not being delivered from Mr. Bollinger's meter. In efforts to correct the estimated reading issues on Mr. Bollinger's account, Kentucky-American created service orders on February 22, 2018, March 23, 2018, May 23, 2018, May 29, 2018, June 25, 2018, June 28, 2018, and July 24, 2018.
- d. Service orders are given expected completion dates in order to help manage and prioritize work for the field employees. Orders are not automatically renewed after expiration in order to not create duplicate work; when problems persist, new orders are created.
- e. The statement "the meter pit needed to be located" means that at the time the service order was worked the meter pit could not be found by the field employee.
- f. This account did have an actual read delivered on May 18, 2018 which occurred in the timeframe questioned of January 23, 2018 through August 20, 2018. Kentucky-American has previously stated why it was unable to obtain actual reads. See KAW's October 22, 2019 response to PSC 2-2 and KAW's September 5, 2019 response to PSC 1-2 which is quoted below:

KAW strives to read every water meter every month. Under certain circumstances, when KAW cannot obtain reliable actual usage information, estimated usage is used instead. This can happen when KAW's automatic radio read meter system is unable to obtain reliable actual usage. Such an inability can happen for a number of reasons, including a communication breakdown between the signal emitting device on a

meter (which is called a meter interface unit or “MIU”) and the receiving device located in a KAW vehicle that is driven by a customer premise for the purpose of obtaining usage information. That communication breakdown can happen because of a dead or malfunctioning battery in the MIU, a physical obstruction on the MIU such as yard waste, sod, snow, or ice, an inadvertently damaged MIU from rakes, shovels, or mowers, or even intentional tampering with the MIU. Regardless of the cause, if actual usage data is not transmitted, KAW’s billing system generates and sends a bill based on estimated usage. KAW believes this is what happened in Mr. Bollinger’s case when KAW’s system generated estimated usage during this 150-day period. However, it is imperative to understand that even if there is a communication breakdown due to an MIU problem that prevents the transmission of actual usage data to KAW’s employee, the meter itself still retains the actual usage data. It is simply that communication of that actual usage data failed to occur. The meter itself retains the actual usage amounts, so, eventually, accurate actual usage can be obtained.

Below, is a chart depicting records of Kentucky-American’s attempts to investigate the issue through service orders.

Completion Status	Created On	Completion Date
Field Complete	7/24/2018	7/25/2018
Field Complete	6/28/2018	7/9/2018
Field Complete	6/25/2018	6/27/2018
Field Complete	5/29/2018	6/6/2018
Field Complete	5/23/2018	5/23/2018
Incomplete	3/23/2018	4/11/2018
Auto-Expired	2/22/2018	3/15/2018

- g. Kentucky-American has implemented review processes designed to reduce the number of open service orders. Additionally, Kentucky-American has focused on completing service orders that will decrease consecutively estimated accounts.

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Witness: Jasmine S. Mungo

5. Explain whether Kentucky-American has offered a payment plan to Mr. Bollinger commensurate in time with the amount of months that it estimated usage instead of obtaining actual water usage.

Response:

Kentucky-American did offer a payment plan to Mr. Bollinger. Specifics of payment plan options (such as length of the plan) were not discussed, per customer request. Mr. Bollinger was not interested in a payment plan.

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6. State whether Kentucky-American was ever notified of a leak at Mr. Bollinger's premises.

Response:

Kentucky-American was not informed of a leak at Mr. Bollinger's premise. Mr. Bollinger denies that there was ever a leak at the premise. However, KAW emphasizes that the daily log attached to KAW's June 24, 2019 Answer and Motion to Dismiss reflects significantly higher usage during the first two weeks of May 2018 and for a short period in early June 2018. After that, usage decreased which was before the meter was changed on August 16, 2018. KAW does not know and it not obliged to know why the higher usage occurred on the customer's side of the meter. However, KAW does know that the meter that recorded that higher usage tested accurately as proven by the meter test results attached to KAW's Answer and Motion to Dismiss.